

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States Court of Appeals, Sixth Circuit.

UNITED STATES of America, Plaintiff-Appellee, v. Felix WALLS, Defendant-Appellant

Case No. 92-80236

MOTION FOR COMPASSIONATE RELEASE

Dear Judge Robert H. Cleland:

My name is Allegra Walls and I am submitting this motion for compassionate release on behalf of my father Felix Walls who has been imprisoned for a nonviolent drug offense for the last 26 years. My father has Parkinson's disease, osteoarthritis, sciatica, and cardiovascular heart disease, is legally blind due to severe cataracts and is confined to a wheelchair and further requires assistance with his instrumental activities of daily living. He has experienced deteriorating physical health that substantially diminishes his ability to function in a correctional facility, according to the B.O.P.'s assessment. We applied for compassionate release and it was previously denied. Your order stated: "The Defendant has accumulated age-related ailments that appear to be entirely common among men of his age, perhaps especially African American men with respect to heart disease". As a reasonable person, I was able to reflect upon your honor's ruling and in doing so I tried to be as objective as possible. Each of these ailments individually may be considered common to some, for a man of my father's age, however, one must recognize that the totality of the circumstances leads to the combination of these ailments arising to the level of an extraordinary circumstance. I honestly believe that in and of itself should've guaranteed my father's compassionate release before but it's not my right to challenge your ruling and I respect that even if I did not agree. However, this already extraordinary circumstance, coupled with the fact that there are eight known cases of COVID-19 in the Forrest City FCI where my father is incarcerated should certainly warrant his immediate release. At his advanced age and taking his deteriorating health into consideration, my father is not a threat to society due both to his physical condition and more importantly the fact that he has been rehabilitated.

He has been an exemplary prisoner and a role model for younger prisoners during his incarceration. He is respectful to all of the prison staff, guards, and other prisoners and he is treated with respect in return. He has taken many classes, including parenting classes, been a role model and honestly has been a better person, father and grandfather since becoming incarcerated. He is patient, and kind and it would be an honor for myself and my siblings to care for him at this point in his life. We would like his grandchildren to be able to spend whatever time he has left getting to know him.

Please take into consideration that the BOP, Warden, review committees, licensed medical professionals, the regional director, general council of the bop, and a representative from the justice department and the federal probation department all signed off finding compelling and extraordinary grounds to wholeheartedly support his compassionate release. I respectfully petition the court to review the current dire situation and I implore you to release my father to our family to care for him. When considering his age, and the combination of his very severe and extraordinary health issues, in conjunction with the grave outcomes for the sick and elderly that COVID-19 presents, my father does not have the time to wait for the wheels of justice to continue to turn slowly as his life sentence could become a premature death sentence and surely that was not the intention of this court at sentencing. The only compassionate resolution is to immediately release him to the care of our family expeditiously. Thank you for your time and careful consideration of the very time sensitive and pressing matter at hand.

Respectfully Submitted,

 POA Felix Walls

Allegra D. Walls
POA for Felix Walls